

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

HAYWARD INDUSTRIES, INC.,

Plaintiff

v.

BLUEWORKS CORPORATION,
BLUEWORKS INNOVATION
CORPORATION, NINGBO C.F.
ELECTRONIC TECH CO., LTD; NINGBO
YISHANG IMPORT AND EXPORT CO.,
LTD.

Defendants.

Civil Action No. 3:20-CV-710 -MOC-SCR

**CONSENT MOTION FOR DEFENDANTS' OUT-OF-STATE COUNSEL TO
ATTEND OCTOBER 23, 2024 STATUS CONFERENCE REMOTELY**

Defendants Blueworks Corporation (“Blueworks Corp.”), Blueworks Innovation Corporation (“Blueworks Innovation”), Ningbo C.F. Electronic Tech Co., Ltd. (“Ningbo C.F.”), and Ningbo Yishang Import and Export Co., Ltd. (“Ningbo Yishang”) (collectively, “Defendants”) hereby move the Court and seek permission to have their out-of-state counsel Michelle C. Dunn appear at the upcoming Status Conference by videoconference. The remainder of Defendants’ counsel will appear in person. In support of this Motion, Defendants show the Court as follows:

1. The Court has scheduled a Status Conference in this matter for October 23, 2024.
2. Michelle C. Dunn, counsel for Defendants, is unable to travel to Charlotte for the Status Conference due to a prescheduled business trip.
3. Michelle C. Dunn is available to appear remotely by videoconference or some other alternative means, as the Court will allow.

4. Local counsel for Defendants, Christina Davidson Trimmer and Samuel Alexander Long, Jr. plan to attend the Status Conference in person. Debtor's counsel for Blueworks Corp. Matthew L. Tomsic also plans to attend the Status Conference in person.

5. Therefore, Defendants seek permission of the Court to permit Michelle C. Dunn to attend the Status Conference remotely, with Christina Davidson Trimmer, Samuel Alexander Long, Jr., and Matthew L. Tomsic attending in person.

6. Defendants have consulted with counsel for Plaintiff, and Plaintiff has consented to this Motion.

WHEREFORE, Defendants respectfully request that Michelle C. Dunn be permitted to attend the October 23, 2024, Status Conference remotely.

Dated: October 14, 2024 Respectfully submitted,

/s/ Christina Davidson Trimmer

Christina Davidson Trimmer

NC Bar No. 44857

Samuel Alexander Long, Jr.

NC Bar No. 46588

SHUMAKER, LOOP & KENDRICK, LLP

101 South Tryon Street

Suite 2200

Charlotte, North Carolina 28280

Tel: (704) 375-0057

Fax: (704) 332-1197

Email: ctrimmer@shumaker.com

along@shumaker.com

Michelle C. Dunn

Platinum Intellectual Property

3031 Tisch Way, Suite 110 PW

San Jose, CA 95128

Tel: 404-800-5884

Fax: 877-463-0654

Email: michelle.dunn@platinum-ip.com

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on October 14, 2024, the foregoing document was served on all counsel of record using the Court's CM/ECF system, which will send notification of such filing to all CM/ECF participants.

Respectfully submitted,

/s/ Christina Davidson Trimmer

Christina Davidson Trimmer

NC Bar No. 44857

SHUMAKER, LOOP & KENDRICK, LLP

101 South Tryon Street

Suite 2200

Charlotte, North Carolina 28280

Tel: (704) 375-0057

Fax: (704) 332-1197

Email: ctrimmer@shumaker.com